IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

POWER-ONE, INC., Plaintiff, v. ARTESYN TECHNOLOGIES, INC. and SILICON LABORATORIES INC., Defendants.	CIVIL ACTION NO. 2:05-CV-463 (LED-JDL) **JURY**

**JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT
PURSUANT TO P.R. 4-3**

Pursuant to P.R. 4-3, the parties submit the following construction of claim terms, phrases, and clauses of the asserted claims of U.S. Patent Nos. 6,936,999 ("the '999 Patent"), 6,949,916 ("the '916 Patent"), 7,000,125 ("the '125 Patent") and 7,049,798 ("the '798 Patent") which the parties collectively identified for claim construction purposes.

References to Intrinsic Support by the parties are designated by patent column and line number, but it is important that it be understood that all claim terms are interpreted in light of the entirety of the patent at issue. As such, the parties reserve the right to refer to additional portions of the specifications of the asserted patents as necessary to interpret the asserted claims. In addition, for all references to Intrinsic Support provided by the parties, references to any one patent may be applied to similar terms or phrases in any of the patents or asserted claims. The parties may also consult a dictionary if it would assist the Court in construing terms, and particularly, Defendants may do so, without limitation, for terms whose intrinsic support includes an assertion of "ordinary meaning."   Defendants may use Webster's Third New International Dictionary (1993) for this purpose.   Pursuant to P.R. 4-3(a), the table below lists the construction of those claim terms, phrases, or clauses on which the parties agree.

CLAIM TERM	DEFINITION
Calculate '999 Patent: Claims 12, 13, 21-27, 29	To ascertain based on calculations.
Control unit '999 Patent: Claims 1-4, 21-27, 30 '798 Patent: Claim 1	Circuitry in a POL regulator that controls the operation of the POL regulator.
Data bus '999 Patent: Claims 1, 2, 8, 21-27 '916 Patent: Claims 1, 2, 13, 14 '125 Patent: Claims 1, 2, 10, 16, 23, 30 '798 Patent: Claims 1, 24	A bus for transmitting or receiving digital data either synchronously or asynchronously.
Default configuration settings '125 Patent: Claims 15, 30	Configuration settings used in the absence of configuration data being received via the data bus.
Enable data '999 Patent: Claim 14	Data that allows a POL regulator to produce an output.
Enable/disable data '798 Patent: Claim 8	Data that allows a POL regulator to produce an output or disallows a POL regulator from producing an output.

Generate/generating an output '999 Patent: Claims 1, 2, 9-13, 15, 21-27 '798 Patent: Claims 24, 26	Create/creating an output.
Output builder '999 Patent: Claims 1, 2, 21-27	A voltage building and converting circuit that is part of a POL regulator and that is adapted to generate an output voltage provided to a load.
Output-timing data '999 Patent: Claims 9-13, 15	Data used to determine when in time a change in the output provided by a POL regulator occurs.
Power conversion circuit '125 Patent: Claim 23	Circuitry that transforms an input voltage to the desired output voltage according to settings received through a serial interface, hardwired settings, or default settings.
Programming parameters '125 Patent: Claims 16, 17, 22	Information that is received by a power supply controller that relates to a programmable characteristic of a point-of-load regulator.
Received externally '999 Patent: Claims 21-27	Received from a source external to the POL regulator.
The phrase "**permitting programming in the absence of data received from said system controller via said serial interface**" '125 Patent: Claim 11	The phrase "permitting programming in the absence of data received from said system controller via said serial interface" requires that each of the plurality of POL regulators includes a hardwired interface through which the POL regulator can be programmed without using the serial interface.
Timing data '798 Patent: Claim 9	Data used to determine when in time a change in the output provided by a POL regulator occurs.

Timing parameter '999 Patent: Claim 1, 9, 10, 11, 12, 13, 15, 21, 23, 24, 25, 26, 27	A parameter used to determine when in time a change in the output provided by the regulator occurs.

Pursuant to P.R. 4-3(b), the table below lists each party's proposed construction of each disputed claim term, phrase, or clause:

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Point of load regulator '999 Patent: Claims 1, 2, 9, 10-13, 15-17, 19-33 '916 Patent: Claims 1, 4, 6-7, 9, 14, 15, 17, 20-22 '125 Patent: Claims 1, 2, 4, 10, 11, 13, 15, 16, 23, 30 '798 Patent: Claims 1, 2, 16-18, 24, 32-40	Ordinary meaning in the art: A DC/DC switching voltage regulator designed to receive power from a voltage bus on a printed circuit board and adapted to power a portion of the devices on the board and to be placed near the one or more devices being powered as part of a distributed board-level power system. Extrinsic Support: Richard Wilson, *The Battle for Power*, Electronics Weekly 27/11/2002 (www.electronicsweekly.com) P 032742-P 032742 *Non-isolated, point-of-load dc-dc converters*, available at http://www.artesyn.com/powergroup/point-of-load.htm P 030149-P 030149 *General-Purpose, Point-of-Load DC-DC Converters*, available at http://www.artesyn.com/powergroup/pol_general.htm P 030150-P 030151 *Power Technology: Part Four, Power on Board*, EDN Worldwide,	A programmable device that receives board-level power at an intermediate voltage level over an intermediate voltage bus and converts the board-level power to produce a specific low voltage, high current power output demanded by a specific electronic circuit that is located physically near the regulator that includes at least a storage device, an output builder, and a control unit. Intrinsic Support: '999 Patent at 1:13 – 55; 2:4 – 40; 3:59 – 4:15; Abstract; Figures 1 – 3; Claims 1, 2, 9 – 13, 15 – 17, 21 – 33. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18. '916 Patent at 1:14 – 46; 2:9 – 28; 2:60 – 3:30; 3: 40 – 52; Figures 1 – 3; Claims 1, 4, 6, 9, 14, 15, 17, 20 – 22. '125 Patent at 1:31 – 41; 3:18 – 39; 5:24 – 6:16; Abstract; Figures 1 – 5. '798 Patent at 1:14 – 364:17 – 50.	A programmable voltage or current regulating device positioned near an external load circuit that supplies the load circuit with regulated power necessary for its operation and includes at least a storage device, output builder, and control unit. Intrinsic Support: '999 Patent at 3:59 – 4:15; 1:12 – 35; 2:4 – 40; Abstract; Figures 1 – 3; Claims 1, 2, 9 – 13, 15 – 17, 21 – 33. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18. '916 Patent at 1:14 – 46; 2:9 – 28; 2:60 – 3:30; 3: 40 – 52; Figures 1 – 3; Claims 1, 4, 6, 9, 14, 15, 17, 20 – 22. '125 Patent at 1:31 – 64; 3:23 – 39; 4:35 – 49; 5:24 – 49; Abstract; Figures 1 – 5. '798 Patent at 1:13 – 58; 2:7 – 9; 3:29 – 41; 4:21 – 27; 5:64 – 6:20; Abstract; Figures 1, 2, 3.1, 3.2, 6, 7; Claims 1, 2, 16 – 18, 24, 32 – 40.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
	November 2004 P046990-P047013 *Feeling isolated?*, Feature Article by Artesyn Technologies P046984-P046989 Testimony of Dennis Roark, CTO of Power-One, Inc		
Voltage set point data '999 Patent: Claims 2, 3, 4, 26, 27, 30 '916 Patent: Claims 4, 10, 15, 21 '798 Patent: Claims 3, 32	Data used to specify the commanded output voltage level of the POL regulator. U.S. Patent No. 6,936,999: Col. 4 lines 1-5 U.S. Patent No. 7,049,798: Col. 4 line 51 – Col. 5 line 12	Data specifying the commanded output voltage level of the POL regulator. Intrinsic Support: '999 Patent at 3:17 – 24; 4:5 – 12, 33 – 45; 6:12 – 40; Claims 2 – 4, 26, 27, 30. '916 Patent at 1:40 – 43; 2:9 – 14; 4:66 – 5:28; Abstract; Claims 4, 10, 15, 21. '798 Patent at 2:10 – 12; 3:42 – 50; 4:53 – 56;	Data specifying the commanded output voltage level of the POL regulator. Intrinsic Support: '999 Patent at 3:17 – 24; 4:5 – 12, 33 – 45; 6:12 – 40; Claims 2 – 4, 26, 27, 30. '916 Patent at 1:40 – 43; 2:9 – 14; 4:66 – 5:28; Abstract; Claims 4, 10, 15, 21. '798 Patent at 2:10 – 12; 3:42 – 50; 4:53 – 56;
Synchronizing signal '916 Patent: Claims 1, 2, 14	A signal that identifies the start of a communication cycle. U.S. Patent No. 6,949,916: Col. 4 lines 1-25; lines 51-65	A clock signal that synchronizes the point of load regulators and creates a series of clock cycles, each one including a data bit. Intrinsic Support: '916 Patent at 3:56 – 4:15; Claims 1, 2, 14.	A clock signal that synchronizes the point of load regulators and creates a series of clock cycles, each one including a data bit. Intrinsic Support: '916 Patent at 3:56 – 4:15; Claims 1, 2, 14.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Initial configuration data '916 Patent: Claims 11, 22 '798 Patent: Claims 1, 3, 5-7, 24, 32-34	Configuration data (i.e. programming data) received prior to the generation of an output voltage. <u>U.S. Patent No. 7,049,798:</u> Col. 4 line 51 – Col. 5 line 12 Col. 2 lines 1-20	Data provided to a POL regulator by a power supply controller prior to any activation of the POL regulator that relates to one or more programmable features of the POL regulator. Intrinsic Support: '916 Patent at 2:9 – 12; 5:29 – 50; Abstract; Claims 11, 22. '798 Patent at 2:9 – 23; 4:51 – 5:12; 7:43 – 54; Figure 6; Claims 1, 3 – 9, 24, 26, 32 – 34.	Output voltage set-point and current limit set-point information written to at least one point of load regulator prior to its use so that it can later provide regulated power. Intrinsic Support: '916 Patent at 2:9 – 12; 5:29 – 50; Abstract; Claims 11, 22. '798 Patent at 2:9 – 23; 4:51 – 5:12; 7:43 – 54; Figure 6; Claims 1, 3 – 9, 24, 26, 32 – 34.
Programming . . . information '125 Patent: Claim 1, 23	Data used to configure the one or more POL regulators in the power system. <u>U.S. Patent No. 7,000,125:</u> Col. 1 lines 51-64 Col. 5 lines 43-47 Col. 6 lines 44-64	Information provided by a system controller to one or more POL regulators that determines a programmable characteristic of a point-of-load regulator such as the address setting for the POL regulator, the identifier of the POL regulator or the phase displacement of the POL regulator. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.	Information that prescribes the operating behavior of a power control system through a sequence of computer instructions. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Control . . . information '125 Patent: Claim 1	Data used to adjust the operation of the one or more POL regulators in the power system.	Information provided by a system controller to one or more POL regulators reflecting a desired operating setpoint for a point-of-load regulator, such as an output voltage setpoint. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.	Information that manages the operation of the power control system. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.
Monitoring information '125 Patent: Claim 1, 23	Data concerning the status of the one or more POL regulators in the power system or surrounding conditions. <u>U.S. Patent No. 7,000,125:</u> Col. 5 lines 33-37 Col. 6 lines 51-55	Information, provided by a POL regulator to a system controller, that keeps track of the operation of the power control system through systematic measurements. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; 6:64 – 7:4 Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.	Information, provided by a POL regulator to a system controller, that keeps track of the operation of the power control system through systematic measurements. Intrinsic Support: '125 Patent at 2:6 - 20; 5: 1 – 23; 6:64 – 7:4 Abstract; Claims 1, 2, 23, 26, 30. Ordinary meaning.
Address set '916 Patent: Claim 1	A set of one or more bits in a message specifying the address of one or more devices connected to a bus. <u>U.S. Patent No. 6,949,916:</u> Col. 4 lines 16-33	A set of bits in a message specifying the address of one or more devices connected to a bus. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 6, 7, 14, 17, 18. Ordinary meaning	A set of bits in a message specifying the address of one or more devices connected to a bus. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 6, 7, 14, 17, 18. Ordinary meaning

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Command set '916 Patent: Claim 1	A set of one or more bits in a message specifying a given command operation U.S. Patent No. 6,949,916: Col. 4 lines 16-33	A set of bits in a message specifying a given command operation. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 8, 14, 19. Ordinary meaning.	A set of bits in a message specifying a given command operation. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 8, 14, 19. Ordinary meaning.
Communication of control and monitoring data therebetween '916 Patent: Claim 1	Sending control and monitoring data between the POL regulator and the data bus. U.S. Patent No. 6,949,916: Figs. 2, 3 Col. 3 lines 40-65 Col. 4 lines 50-65 Col. 5 lines 23-29	Sending both control and monitoring data between POL regulators. Intrinsic Support: '916 Patent at 3:66 – 4:65; Claims 1, 14. Prosecution File History for U.S. Patent Application 10/293,531, Preliminary Amendment, Mailroom Stamped Feb. 2, 2004.	Sending both control and monitoring data between POL regulators. Intrinsic Support: '916 Patent at 3:66 – 4:65; Claims 1, 14. Prosecution File History for U.S. Patent Application 10/293,531, Preliminary Amendment, Mailroom Stamped Feb. 2, 2004.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Connecting/connected '999 Patent: Claims 1, 2 '916 Patent: Claims 1, 2 '798 Patent: Claim 1 '125 Patent: Claims 1, 16, 23	Electrically connected.	Joined together without an intervening component. Intrinsic Support: '999 Patent at 3:4 – 21; Figures 1, 2; Claims 1, 2. '916 Patent at 1:61 – 65; 5:6 – 8; Figures 1 – 3; Claims 1, 2. '125 Patent at 2:6 – 11; 5:1 – 23; 5:66 – 7:6; Figures 1 – 3, 4; Claims 1, 2, 6, 15. '798 Patent at 1:48 – 50; 3:29 – 36; Figures 1, 2; Claim 1. Ordinary meaning.	Joined together, without an intervening component. Intrinsic Support: '999 Patent at 3:4 – 21; Figures 1, 2; Claims 1, 2. '916 Patent at 1:61 – 65; 5:6 – 8; Figures 1 – 3; Claims 1, 2. '125 Patent at 2:6 – 11; 5:1 – 23; 5:66 – 7:6; Figures 1 – 3, 4; Claims 1, 2, 6, 15. '798 Patent at 1:48 – 50; 3:29 – 36; Figures 1, 2; Claim 1. Ordinary meaning.
Control and monitoring data '916 Patent: Claims 1, 14	See Power-One's constructions for "control … information" and "monitoring … information." U.S. Patent No. 6,949,916: Col. 3 lines 16-30	***"control data"***: a category of data in which each datum determines an operating characteristic of a point-of-load regulator. ***"monitoring data"***: a category of data in which each datum reflects an operating characteristic of a point-of-load regulator. Intrinsic Support: '916 Patent at 1:35 – 45; 2:9 – 27; 5:11 – 28; Figure 6; Abstract; Claims 1, 6, 14, 17.	Information that (a) manages the operation of the power control system and (b) keeps track of the operation of the power control system through systematic measurements. Intrinsic Support: '916 Patent at 1:35 – 45; 2:9 – 27; 5:11 – 28; Figure 6; Abstract; Claims 1, 6, 14, 17.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Controller '999 Patent: Claims 9-17 '916 Patent: Claims 2, 3 '798 Patent: Claims 1, 24, 27 – 31, 41	Ordinary Meaning: Circuitry that controls the operation of one or more devices. U.S. Patent No. 6,936,999: Col. 4 lines 10-15	Same as "power supply controller" Intrinsic Support: '999 patent: same as that for "power supply controller" '916 patent: claim 2; Figures 1-2; Abstract; col. 1, lines 35-45; col. 2, line 60-col. 3, line 30; col. 3, lines 40-65; col. 5, lines 29-50 '798 patent: claims 24, 27; Figures 1-2; Abstract; col. 1, lines 38-58; col. 2, lines 3-10; col. 3, lines 29-67; col. 4, lines 17-30; col. 4, lines 51-53	Same as "power supply controller" Intrinsic Support: '999 patent: same as that for "power supply controller" '916 patent: claim 2; Figures 1-2; Abstract; col. 1, lines 35-45; col. 2, line 60-col. 3, line 30; col. 3, lines 40-65; col. 5, lines 29-50 '798 patent: claims 24, 27; Figures 1-2; Abstract; col. 1, lines 38-58; col. 2, lines 3-10; col. 3, lines 29-67; col. 4, lines 17-30; col. 4, lines 51-53
Controller '125 Patent: Claim 23	Ordinary Meaning: Circuitry that controls the operation of one or more devices.	Same as "control unit" Intrinsic Support: '125 Patent at 5:66 – 6:16; Figure 4; Claim 23.	Same as "control unit" Intrinsic Support: '125 Patent at 5:66 – 6:16; Figure 4; Claim 23.
Data set '916 Patent: Claim 1	A set of one or more bits in a message reflecting data that is read from or written to a device. U.S. Patent No. 6,949,916: Col. 4 lines 16-33	A set of bits in a message reflecting data that is read from or written to a device. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 9 – 11, 14, 20 – 22. Ordinary meaning.	A set of bits in a message reflecting data that is read from or written to a device. Intrinsic Support: '916 Patent at 4:16 – 65; Figure 5; Claims 1, 2, 9 – 11, 14, 20 – 22. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Determine '999 Patent: Claims 1, 4	No construction necessary. This is not a technical term. If a construction is necessary, it should be construed to mean "ascertain."	To ascertain based on calculations. Intrinsic Support: '999 Patent at 2:28 – 34; Abstract	To ascertain based on calculations Intrinsic Support: '999 Patent at 2:28 – 34; Abstract
Fault protection data '916 Patent: Claim 4	Data concerning identification of or response to faults.	A form of monitoring data provided by one point-of-load regulator to another point-of-load regulator through the serial data bus in which each datum is a value reflecting an operating characteristic of the point-of-load regulator sending the message, such as the temperature, output voltage or output current of the sending point-of-load regulator. Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 50; Abstract; Figure 6; Claims 4, 10, 15, 21. Ordinary meaning.	A form of monitoring data provided by one point-of-load regulator to another point-of-load regulator through the serial data bus in which each datum is a value reflecting an operating characteristic of the point-of-load regulator sending the message, such as the temperature, output voltage or output current of the sending point-of-load regulator. Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 50; Abstract; Figure 6; Claims 4, 10, 15, 21. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Fault-monitoring data '798 Patent: Claims 1, 2, 10, 13, 16, 24, 27, 35-40	Data concerning the status of one or more POL regulators in a distributed power system or surrounding conditions. <u>U.S. Patent No. 7,049,798:</u> Col. 7 line 55 – Col. 8 line 34	Information about a possible fault of the POL regulator or its output obtained through systematic measurements using an external device or sensor circuit. Intrinsic Support: '798 Patent at 2:24 – 47; 5:13 – 63; 7:55 – 8:33; Figure 7; Abstract; Claims 1, 2, 10, 13, 16, 24, 27, 35 – 40.	Information about a possible fault of the POL regulator or its output obtained through systematic measurements using an external device or sensor circuit. Intrinsic Support: '798 Patent at 2:24 – 47; 5:13 – 63; 7:55 – 8:33; Figure 7; Abstract; Claims 1, 2, 10, 13, 16, 24, 27, 35 – 40.
Output current set point data '916 Patent: Claim 4	Ordinary Meaning: Data used to specify an output current level.	Data specifying a commanded output current level for the point-of-load regulator Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 29; Abstract; Claims 4, 10, 15, 21. Ordinary meaing.	Data specifying a commanded output current level for the point-of-load regulator Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 29; Abstract; Claims 4, 10, 15, 21. Ordinary meaing.
Output data '999 Patent: Claims 1, 2, 21-27	Ordinary Meaning: Data reflecting information affecting the provision of power to a load.	Real-time data reflecting information affecting the provision of power to a load. Intrinsic Support: '999 Patent, Claims 1, 2, 21 – 27; Figures 4 – 5. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18.	Real-time data reflecting information affecting the provision of power to a load. Intrinsic Support: '999 Patent, Claims 1, 2, 21 – 27; Figures 4 – 5. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Output-voltage set point data '916 Patent: Claim 4	Ordinary Meaning: Data used to specify an output voltage level.	A form of control data provided to by one point-of-load regulator to another point-of-load regulator through the serial data bus in which each datum is a value contained in a message to a specific point-of-load regulator specifying a desired output voltage level for the point-of-load regulator. Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 29; Abstract; Claims 4, 10, 15, 21. Ordinary meaing.	A form of control data provided to by one point-of-load regulator to another point-of-load regulator through the serial data bus in which each datum is a value contained in a message to a specific point-of-load regulator specifying a desired output voltage level for the point-of-load regulator. Intrinsic Support: '916 Patent at 2:15 – 28; 5:11 – 29; Abstract; Claims 4, 10, 15, 21. Ordinary meaing.
Output-voltage-slew-rate data '798 Patent: Claim 7	Ordinary Meaning: Data concerning the rate of change of the output of a device.	Data specifying a commanded rate of change of output voltage for the POL regulator. Intrinsic Support: '798 Patent at 2:16 – 17; 4:59 – 60; Figures 6 – 7; Claims 7, 33. Ordinary meaning.	Data specifying a commanded rate of change of output voltage for the POL regulator. Intrinsic Support: '798 Patent at 2:16 – 17; 4:59 – 60; Figures 6 – 7; Claims 7, 33. Ordinary meaning.
Performance monitoring information '125 Patent: Claim 16	Ordinary Meaning: Information concerning one or more performance characteristics of the device.	Information obtained through systematic measurements that tracks one or more performance characteristics of the device. Intrinsic Support: '125 Patent at 2:6 – 20; Claims 1, 2, 16, 23. Ordinary meaning.	Information obtained through systematic measurements that tracks one or more performance characteristics of the device. Intrinsic Support: '125 Patent at 2:6 – 20; Claims 1, 2, 16, 23. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Power supply controller '999 Patent: Claims 1, 2, 5 '798 Patent: Claim 1	Ordinary Meaning: Circuitry that controls a power supply.	Part of a distributed power control system that activates and at least partially programs and monitors a regulator and allows the output of the POL regulator to be transmitted to an external load circuit. Intrinsic Support: '999 Patent at 1:34 – 42; Abstract; Figures 1, 2; Claims 1, 2, 5. '798 Patent at 1:38 – 58; 3:42 – 67; 4:51 – 67; 5:47 – 63; Figures 1, 2, 6, 7; Claim 1.	Part of a distributed power control system that activates and at least partially programs and monitors a regulator and allows the output of the POL regulator to be transmitted to an external load circuit. Intrinsic Support: '999 Patent at 1:34 – 42; Abstract; Figures 1, 2; Claims 1, 2, 5. '798 Patent at 1:38 – 58; 3:42 – 67; 4:51 – 67; 5:47 – 63; Figures 1, 2, 6, 7; Claim 1.
Sequencing data '999 Patent: Claim 2	Ordinary Meaning: Data used to control the order of operation of multiple POL regulators.	Data specifying the duration of a delay period between the POL's receipt of a turn-on or turn-off command and generation or termination of a desired output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract; Claims 2 – 6, 10, 15, 17, 18, 22, 26 – 32, 34 – 35. Ordinary meaning.	Data specifying the duration of a delay period between the POL's receipt of a turn-on or turn-off command and generation or termination of a desired output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract; Claims 2 – 6, 10, 15, 17, 18, 22, 26 – 32, 34 – 35. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Slew-rate data '999 Patent: Claim 2, 11, 16, 17, 23, 26	Ordinary Meaning: Data used to specify the rate of change of an output voltage.	Data specifying a commanded rate of change of output voltage for the POL regulator. Intrinsic Support: '999 Patent at 4:33 – 45; Claims 2, 11, 16, 17, 23, 26. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18.	Data specifying a commanded rate of change of output voltage for the POL regulator. Intrinsic Support: '999 Patent at 4:33 – 45; Claims 2, 11, 16, 17, 23, 26. Prosecution File History of U.S. Patent Application Serial No. 10/388,831, Amendment, Mailroom Stamp Date Aug. 27, 2004, at 17 – 18.
System controller '125 Patent: Claims 1, 2, 6, 15	Ordinary Meaning: Circuitry that controls the operation of one or more components in a system.	Same as "power supply controller" Intrinsic Support: '125 Patent at 2:6 – 11; 5:1 – 23; 5:66 – 7:6; Figures 1 – 4; Claims 1, 2, 6, 15.	Same as "power supply controller" Intrinsic Support: '125 Patent at 2:6 – 11; 5:1 – 23; 5:66 – 7:6; Figures 1 – 4; Claims 1, 2, 6, 15.
The phrase "at least one of" followed by a list of categories of data U.S. Patent No. 6,936,999: Claims 2, 3, 4, 26, 27, 30 U.S. Patent No. 6,949,916: Claims 1, 2, 4	No construction necessary. The term "at least one of" does not mean "at least one of each of." Rather, it means what it says-- "at least one of" the set < X, Y, and Z>	The phrase "at least one of" followed by a series of categories (data sets) where the term "and" is used to separate the various categories requires the use of at least one data value from each category (data set) set forth in the limitation.	The phrase "at least one of" followed by a series of categories (data sets) where the term "and" is used to separate the various categories requires the use of at least one data value from each category (data set) set forth in the limitation.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Turn-off data '999 Patent: Claim 2, 4, 12, 20, 24, 26, 30	Ordinary Meaning: Data concerning turning off an output.	Data specifying a time period after some event at which the POL regulator should, in the absence of sequencing data, cease to provide an active output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; Abstract; Claims 2, 4, 12, 20, 24, 26, 30. Ordinary meaning.	Data specifying a time period after some event at which the POL regulator should, in the absence of sequencing data, cease to provide an active output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; Abstract; Claims 2, 4, 12, 20, 24, 26, 30. Ordinary meaning.
Turn-off delay period '999 Patent: Claims 12, 20	Ordinary Meaning: The time to wait from an event until starting to cease production of an output.	A period of time that the POL regulator waits after a particular event before terminating the output from a POL regulator to a load. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Abstract; Figure 6; Claims 12, 20. Ordinary meaning.	A period of time that the POL regulator waits after a particular event before terminating the output from a POL regulator to a load. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Abstract; Figure 6; Claims 12, 20. Ordinary meaning.
Turn-off period '999 Patent: Claims 4, 24, 30, 31, 34	Ordinary Meaning: The time to wait from an event until starting to cease production of an output.	A period of time after some event when the POL regulator should cease to provide an active output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Claims 4, 24, 30 – 32, 34, 35. Ordinary meaning.	A period of time after some event when the POL regulator should cease to provide an active output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Claims 4, 24, 30 – 32, 34, 35. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Turn-on data '999 Patent: Claims 2, 3, 13, 19, 25, 26, 27	Ordinary Meaning: Data concerning turning on an output.	Data specifying a time period after some event at which the POL regulator should, in the absence of sequencing data, be generating an output at the voltage level specified by the voltage set-point data provided to the POL regulator. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; Abstract; Claims 2, 3, 13, 19, 25 – 27. Ordinary meaning	Data specifying a time period after some event at which the POL regulator should, in the absence of sequencing data, be generating an output at the voltage level specified by the voltage set-point data provided to the POL regulator. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; Abstract; Claims 2, 3, 13, 19, 25 – 27. Ordinary meaning
Turn-on delay period '999 Patent: Claims 13, 19	Ordinary Meaning: The time to wait from an event until starting to produce an output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract	A period of time that the POL regulator waits after a particular event before transferring power to a load. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract; Claims 13, 19. Ordinary meaning.	A period of time that the POL regulator waits after a particular event before transferring power to a load. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract; Claims 13, 19. Ordinary meaning.

CLAIM TERM	POWER-ONE'S PROPOSED CONSTRUCTION	ARTESYN'S PROPOSED CONSTRUCTION	SILICON LABS' PROPOSED CONSTRUCTION
Turn-on period '999 Patent: Claims 3, 5, 25, 27	Ordinary Meaning: The time to wait from an event until starting to produce an output. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Abstract	A period of time after some event when the POL regulator should be generating an output at the voltage level specified by voltage set-point data provided to the POL regulator. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Claims 3, 5, 6, 13, 18, 25, 27 – 29. Ordinary meaning.	A period of time after some event when the POL regulator should be generating an output at the voltage level specified by voltage set-point data provided to the POL regulator. Intrinsic Support: '999 Patent at 2:14 – 40; 4:16 – 5:2; 7:1 – 21; Figure 6; Claims 3, 5, 6, 13, 18, 25, 27 – 29. Ordinary meaning.

Pursuant to P.R. 4-3(c), the parties anticipate that the length of time necessary for the Claim Construction hearing will be:

Power-One's position: Five hours divided equally between sides.

Artesyn's and Silicon Labs' position: Defendants Artesyn and Silicon Labs disagree with Power-One's request that only five hours of the Court's time be allotted to a *Markman* hearing in this case. Power-One has asserted 81 claims across four separate patents against the defendants. Defendants do not believe that the number of issues arising from Power-One's assertion of 81 claims could be reasonably or competently addressed in 150 minutes allotted per side.   To the extent that Power-One reduces the claims asserted to a reasonable number (e.g., ten to fifteen, as is customary in this Court) the defendants would also request a *Markman* hearing of approximately five hours. However, given the large number of issues in this case, the defendants believe that a claim construction hearing could not be conducted over any less than one full day. Moreover, given that Power-One is asserting these 81 claims against two distinct defendants, each with its own distinct accused devices, the defendants request that the Court divide the time allotted to each of the two sides in this case more equitably than an allotment of one-half the total time per side.

Pursuant to P.R. 4-3(d), Power-One identifies Dennis Roark as a witness to offer testimony on the meaning of "point of load regulator" and has submitted a summary of the testimony to be offered by its witness as Appendix A attached hereto. In addition, the defendants have indicated an interest in taking the depositions of Power-One's inventors. Power-One and/or Defendants may offer portions of such deposition testimony in claim construction briefing and at the claim construction hearing.

Silicon Labs may call Don Alfano as a fact witness to testify about his understanding (and/or the understanding of one of ordinary skill in the art) of patent claim terms and

particularly the meaning of "point of load regulator." Mr. Alfano has been previously identified in Silicon Labs' interrogatory responses.

Pursuant to P.R. 4-3(e), Power-One identifies the following issues that might require a pre-hearing conference prior to the claim construction hearing:

(1)   Power-One has requested and is awaiting document discovery concerning the ordinary meaning of the term "point of load regulator" from defendants. If a discovery dispute regarding this request ensues, Power-One may require assistance from the Court to obtain the needed discovery well in advance of the claim construction hearing.

(2)   Power-One has identified a witness to offer testimony concerning the meaning of "point of load regulator" to one of ordinary skill in the art and has provided a summary of the expected testimony. At least one of the defendants has stated an intention to possibly call a rebuttal witness, but does not intend to provide a summary of the expected rebuttal testimony. Power-One believes that any rebuttal testimony concerning the meaning of "point of load regulator" to one of ordinary skill in the art is properly classified as expert testimony. Power-One believes that the testimony of such a rebuttal witness would only be relevant to the extent that the witness was testifying as to the generally accepted understanding in the relevant field—which is expert testimony. Defendants disagree with position of Power-One and believe it is proper to reserve the right to call a fact witness to comment on the meaning of terms such as "point of load regulator." Power-One believes that it is entitled to a summary of any rebuttal testimony. If no statement is received and the parties cannot resolve this dispute on their own, Power-One may request a hearing to resolve the issue.

Date: July 7, 2006

Robert J. McAughan, Jr.
Texas State Bar No. 00786096
Lead Attorney
LOCKE LIDDELL & SAPP LLP
3400 JP Morgan Chase Tower
600 Travis Street
Houston, Texas 77002-3095
Telephone: (713) 226-1200
Facsimile: (713) 223-3717
bmcaughan@lockeliddell.com

Jennifer Parker Ainsworth
Texas State Bar No. 00784720
WILSON, SHEEHY, KNOWLES,
        ROBERTSON & CORNELIUS, PC
One American Center
909 ESE Loop 323, Suite 400
Tyler, Texas 75701
Telephone: (903) 509-5000
Facsimile: (903) 509-5091
jainsworth@wilsonlawfirm.com

Respectfully submitted,

By: */s/ Jeffrey A. Andrews_____*

Jeffrey A. Andrews
Texas State Bar No. 24050227
LOCKE LIDDELL & SAPP LLP
3400 JP Morgan Chase Tower
600 Travis Street
Houston, Texas 77002-3095
Telephone: (713) 226-1200
Facsimile: (713) 223-3717
jandrews@lockeliddell.com

*Attorneys for Defendant Artesyn
Technologies, Inc.*

Mark T. Garrett
Texas State Bar No. 24007225
Michael C. Barrett
Texas State Bar No. 24006803
FULBRIGHT & JAWORSKI, LLP
600 Congress Ave., Suite 2400
Austin, Texas 78701-3271
mbarrett@fulbright.com
mgarrett@fulbright.com

By: */s/ Christopher R. Benson*
     by permission, Jeffrey A. Andrews____
Christopher R. Benson
Texas State Bar No. 02164020
FULBRIGHT & JAWORSKI, LLP
600 Congress Ave., Suite 2400
Austin, Texas 78701-3271
Telephone: (512) 536-3003
Facsimile: (512) 536-4598
cbenson@fulbright.com

*Attorneys for Defendant Silicon
Laboratories, Inc.*

By: */s/ Steven R. Katz*
by permission, Jeffrey A. Andrews__

E. Glenn Thames, Jr.   Steven R. Katz, BBO#642732
State Bar No. 00785097   Alan D. Smith, BBO#629034
a35@potterminton.com   Michael H. Bunis, BBO#566839
Michael E. Jones   FISH & RICHARDSON, P.C.
State Bar No. 10929400   225 Franklin Street
mikejones@potterminton.com   Boston, Massachusetts 02110-2804
POTTER MINTON, P.C.   Telephone: (617) 542-5070
500 Plaza Tower   Facsimile: (617) 542-8906
110 North College Avenue
Tyler, Texas 75702   Thomas M. Melsheimer
Telephone: (903) 597-8311   M. Brett Johnson
Facsimile: (903) 593-0846   FISH & RICHARDSON, P.C.
                                              1717 Main Street, Suite 5000
                                              Dallas, Texas 75201
                                              Telephone: (214) 747-5070
                                              Facsimile: (214) 747-2091

                                              Attorneys for Plaintiff Power-One, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing:

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT
PURSUANT TO P.R. 4-3

was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by certified mail, return receipt requested, on this the 7th day of July, 2006.

/s/ Jeffrey A. Andrews_____

Jeffrey A. Andrews